



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

LOUIS MARTIN BLAZER,  
a/k/a "Marty,"

Defendant.

17 Cr. ( )

17 CRIM 563

COUNT ONE

**(Securities Fraud)**

The United States Attorney charges:

1. From at least in or about 2009 through in or about 2013, in the Southern District of New York and elsewhere, LOUIS MARTIN BLAZER, a/k/a "Marty," the defendant, willfully and knowingly, directly and indirectly, by the use of the means and instrumentalities of interstate commerce, and of the mails, and of the facilities of national securities exchanges, used and employed, in connection with the purchase and sale of securities, manipulative and deceptive devices and contrivances, in violation of Title 17, Code of Federal Regulations, Section 240.10b-5, by (a) employing devices, schemes, and artifices to defraud; (b) making and causing to be made untrue statements of material facts and omitting to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; and

(c) engaging in acts, practices, and courses of business which operated and would operate as a fraud and deceit upon other persons, to wit, BLAZER, a registered investment advisor and business manager for professional athletes, invested funds belonging to approximately five athlete clients in various music and movie ventures without authorization from those clients, and in connection therewith made material misrepresentations and omitted material facts from those clients with respect to the investments.

(Title 15, United States Code, Sections 78j(b) & 78ff;  
Title 17, Code of Federal Regulations, Section 240.10b-5, and  
Title 18, United States Code, Section 2.)

**COUNT TWO**

**(Wire Fraud)**

The United States Attorney further charges:

2. From at least in or about 2009 through in or about 2013, in the Southern District of New York and elsewhere, LOUIS MARTIN BLAZER, a/k/a "Marty," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds

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for the purpose of executing such scheme and artifice, to wit, BLAZER, including by wire transfer, funded various music and movie ventures with money belonging to his professional athlete clients without authorization from those clients and, in several instances, falsified reports prepared for those clients regarding the use of their money.

(Title 18, United States Code, Sections 1343 and 2.)

**COUNT THREE**

**(Aggravated Identity Theft)**

The United States Attorney further charges:

3. From at least in or about 2009 through in or about 2013, in the Southern District of New York and elsewhere, LOUIS MARTIN BLAZER, a/k/a "Marty," the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, BLAZER transferred, possessed, and used the name of at least one other person without that person's permission in connection with the wire fraud offense charged in Count Two of this Information.

(Title 18, United States Code, Sections 1028A and 2.)

**COUNT FOUR**

**(False Statements)**

The United States Attorney further charges:

4. In or about 2013, in the Southern District of New York and elsewhere, LOUIS MARTIN BLAZER, a/k/a "Marty," the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, willfully and knowingly did falsify, conceal, and cover up by trick, scheme, and device material facts, make materially false, fictitious, and fraudulent statements and representations, and make and use false writings and documents knowing the same to contain materially false, fictitious, and fraudulent statements and entries, to wit, BLAZER, in connection with a Securities and Exchange Commission ("SEC") examination of the fraudulent activity charged in Counts One and Two above, created and provided to the SEC fake documentation regarding the investments under investigation, and falsely told SEC staff that the investments under investigation were all authorized by BLAZER's clients.

(Title 18, United States Code, Section 1001.)

**COUNT FIVE**

**(Wire Fraud)**

The United States Attorney further charges:

5. From in or about 2000 through in or about 2013, in the Middle District of Pennsylvania and elsewhere, LOUIS MARTIN BLAZER, a/k/a "Marty," the defendant, willfully and knowingly, having devised a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, BLAZER participated in a scheme to defraud universities by making payments to student-athletes at those universities in exchange for the student-athletes' agreement to retain BLAZER as a financial advisor or business manager, which payments were concealed from the universities and which, if revealed, would have caused the universities economic harm, and which deprived the universities of their money and property, including, but not limited to, their right to control the use of their assets, such as the payment of athletic scholarships.

(Title 18, United States Code, Section 1343.)

**FORFEITURE ALLEGATION**

6. As a result of committing one or more of the offenses alleged in Counts One, Two, and Five of this Information, LOUIS MARTIN BLAZER, a/k/a "Marty," the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses.

**Substitute Assets Provision**

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value;

or

- e. has been commingled with other property

which cannot be divided without difficulty, it is the intent of

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the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Section 981; Title 28, United States Code, Section 2461.)

Joan H. Kim

JOON H. KIM

Acting United States Attorney

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Information

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(15 U.S.C. §§ 78j(b) & 78ff; 17 C.F.R. §  
240.10b-5; 18 U.S.C. §§ 2, 981, 1028A,  
1343 and 1001; 28 U.S.C. § 2461.)

JOON H. KIM  
Acting United States Attorney.